

Exhibit N

Message

From: Williams, Matt J. [MJWilliams@gibsondunn.com]
Sent: 8/16/2017 03:37:45
To: Steel Howard S. (hsteel@brownrudnick.com) [hsteel@brownrudnick.com]
CC: Martorana, Keith R. [KMartorana@gibsondunn.com]; Gillett, Gabriel K. [GGillett@gibsondunn.com]
Subject: FRE 408 - confidential

Howie - attached find a draft letter we are considering sending, subject to internal and client review and comment. (There may be some minor changes but this is general idea of what we'd send). We understand from akin that you guys may send something as well. Please send us a draft for our review prior to filing so we are all consistent.

MJW

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3:06 AM

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Done GM - Draft Chambers Conference Res...

SOUTHERN DISTRICT OF NEW YORK
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

Re: *In re Motors Liquidation Company*, Case No. 09-50026 (MG).

Dear Judge Glenn:

We represent the Wilmington Trust Company, trustee for and administrator of the Motors Liquidation Company GUC Trust (the “**GUC Trust**”). We write in response to the letter submitted to the Court yesterday afternoon by Arthur Steinberg of King & Spalding LLP, counsel for General Motors LLC (“**New GM**”), in which Mr. Steinberg requests that the Court cancel the Chambers conference scheduled for August 17, 2017 (the “**Conference**”), which was requested at the behest of the GUC Trust, the Unitholders, and the proponents (the “**Economic Loss Plaintiffs**” and the “**Pre-Closing Accident Plaintiffs**”) of the Late Claims Motions filed with the Court in December 2016 and July 2017.

The GUC Trust has no objection to the Conference proceeding on the record in open Court, rather than in Chambers. The purpose of scheduling the Conference was to update the Court on the status of a potential settlement between the GUC Trust, the Economic Loss Plaintiffs and the Pre-Closing Accident Plaintiffs (the “**Proposed Settlement**”), which Proposed Settlement is nearly final, but has not yet been executed by the parties and is non-binding. There was never any intention of having a substantive discussion of the merits of the Proposed Settlement at the Conference, or seeking any substantive relief. Thus, New GM will not be prejudiced by the Conference in any way, or precluded from objecting to any Proposed Settlement or seeking to withdraw the reference.

In light of the foregoing, we respectfully request that the Court keep the Conference on the calendar. We are available at the Court’s convenience should Your Honor wish to discuss this matter further.

Respectfully,

Matthew J. Williams



Matthew J. Williams

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